

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

GOLD RESERVE'S WITNESS DISCLOSURE

Gold Reserve Ltd. f/k/a Gold Reserve Inc. ("Gold Reserve") makes this disclosure in accordance with the Court's Scheduling Order (D.I. 2110). Gold Reserve intends to call the following witnesses, including expert witnesses, at the Sale Hearing.

Witness	Statement of Intended Testimony and Justification for Calling at the Sale Hearing
Paul Rivett	<p>Paul Rivett is Gold Reserve's CEO. He will testify on Gold Reserve's behalf at the Sale Hearing pursuant to the Sales Procedure Order and in support of the Dalinar Bid, Gold Reserve's Motion to Strike and Gold Reserve's objections to the Updated Final Recommendation.</p> <p>His testimony will include that which is required by the Sales Procedure Order, as well as rebutting any arguments proffered by any party that objects to the Dalinar Energy bid. He also will testify regarding Gold Reserve's involvement in the Sale Process, including the subjects identified in his deposition and his previously-filed declarations.</p>
The Hon. Christopher Sontchi	<p>Judge Sontchi is an expert witness designated by Gold Reserve. His testimony will address the subjects identified in his report, which was filed in support of Gold Reserve's motion to stroke, as well as any subsequent reports and/or any deposition.</p>

Dr. Christopher Bennett	Dr. Bennett is an expert witness designated to rebut the testimony of Dr. Heaton, an expert witness designated by Red Tree. Gold Reserve's position is that Dr. Heaton's expert report is fundamentally flawed and of so limited in scope that it is of no use to the Court. Dr. Bennett's testimony will support this argument. Dr. Bennet is a rebuttal expert, and only will be called if Dr. Heaton is called.
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Gold Reserve reserves the right to supplement or amend this list as discovery progresses and as permitted by the Federal Rule of Civil Procedure 26(e), and to call any witness identified by any other party. These disclosures are made subject to and without waiving Gold Reserve's right to object to the qualifications, reliability, or relevance of any witness identified by any other party and/or seek *in limine* protection to exclude such person or persons from testifying.

Dated: August 31, 2025

Respectfully submitted,

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